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Federal Policy  
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May 10, 2004

Secretary of the Maritime Administration  
Department of Transportation  
400 7<sup>th</sup> St.,  
Washington, D.C. 20590

VIA FAX 202 366-3511 - 50

Dear Mr. Secretary:

I am writing to request that you extend the public comment period on lease financing regulations (USCG Docket No. USCG 2003-1472) promulgated by MARAD and the Coast Guard on February 4, 2004. Extraordinary circumstances warrant this action.

I represent Nabors Industries, Inc., a company that would be materially affected by the lease financing regulations. In the middle of April, we scheduled a May 10 meeting with Captain William Schubert and the Chief Executive Officer of Nabors, Gene Isenberg, to discuss the regulations. Yesterday, we received a call from Robert Ostrom, Chief Counsel of MARAD, advising us that the May 10 meeting could not occur because the docket for comment on the regulations closed on May 4. He explained that any *ex parte* meeting on the regulations would have to be noted on an open docket. He also noted that a meeting could occur if the docket were reopened.

I find it troubling that MARAD would schedule a meeting with a regulation commenter for a date that MARAD should have known would follow the closing of the docket and, thus, could not occur.

Accordingly, I would request that you reopen the docket (i.e., extend the public comment period) on the lease financing regulations to allow us to reschedule a meeting with you. You are authorized to take such action by 46 CFR 201.53.

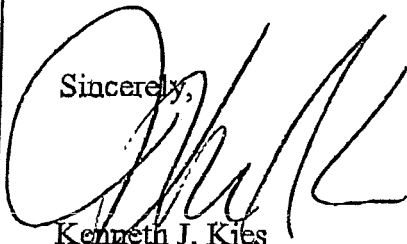
The interest of fairness demands this action. Other companies that would be materially affected by the regulations have had an opportunity to meet with the Administrator and discuss their concerns. Like these companies, Nabors and its representatives contacted MARAD well before the end of the May 4 comment period to arrange a meeting.

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Thank you for your consideration of this request. Please do not hesitate to call me at (202) 772-2482 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'KJ Kies', written over the word 'Sincerely,'.

Kenneth J. Kies  
Managing Director